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January 24, 2019

VIA EMAIL: [REDACTED]
& U.S. MAIL
[REDACTED]

Re: Robbins Research Int'l., Inc. / Gary King
Our File No. 1470-281

Dear Mr. [REDACTED]

This letter responds to your letter of January 14, 2019, and is in furtherance of my letters to you and Mr. King of November 30, 2018, December 7, 14 and 21, 2018.

It is telling that although Mr. King denies having made any "false statements" to *BuzzFeed*, he does not deny being the "source" of information to *BuzzFeed* regarding Mr. Robbins and Robbins Research International, Inc. ("RRI"). Moreover, I doubt whether Mr. King knows whether the statements he made to *BuzzFeed* regarding my clients are legally defamatory or not. Accordingly, although he may believe that, as the source of information regarding my clients to *BuzzFeed*, he did not make any statements which were "defamatory", in fact, should *BuzzFeed* publish any statements regarding my clients which are attributable to Mr. King and which are determined to be defamatory, we will commence an appropriate action against *BuzzFeed* and Mr. King as the source of the defamatory content. Based on the information we have received from our investigation and statements made by the *BuzzFeed* reporters to third parties, we are confident that the statements and rumors regarding my clients conveyed to *BuzzFeed* by Mr. King are most certainly false and defamatory.

In addition, it is noteworthy that Mr. King has refused to comply with my prior request that he inform *BuzzFeed* that *BuzzFeed* may not rely on him as the purported source of any information regarding my clients. If Mr. King were not the source of information to *BuzzFeed*, he should have no objection to notifying *BuzzFeed* accordingly.

Further, Mr. King has refused to confirm that he will preserve and maintain all written and electronic communications with all persons affiliated with *BuzzFeed*. As previously stated, should a legal action become necessary against *BuzzFeed* and/or Mr. King based on the publication of any defamatory content pertaining to my clients, we intend to subpoena or compel production of

Re: Robbins Research Int'l., Inc. / Gary King
January 24, 2019
Page 2

all written communications between Mr. King and *BuzzFeed*, and, accordingly, demand is again made that Mr. King retain and maintain any and all written communications by and between him and *BuzzFeed*, including text messages, email, Facebook or other social media communications, and all phone records of any telephone conversations he has had with any persons affiliated with *BuzzFeed*.

With respect to jurisdiction over any lawsuit that may be necessary against *BuzzFeed* and/or Mr. King, we are confident that the courts in the State of California will readily exercise jurisdiction over Mr. King. RRI's principal place of business is located in California (which Mr. King is well aware of) and it is foreseeable to Mr. King that any damages that may be caused to RRI as a result of his wrongful conduct would be suffered by RRI in California. Under those circumstances, the courts in California will exercise jurisdiction over Mr. King.

Lastly, your suggestion that my communications to you and Mr. King have caused him emotional distress is misplaced and rejected. If Mr. King has suffered any emotional distress as a result of receiving my correspondence, he has no one to blame other than himself. He chose to communicate with *BuzzFeed* and convey false and defamatory statements and rumors pertaining to my clients. My letters to you and Mr. King were intended to provide Mr. King with notice of the consequences of his conduct and afford him an opportunity to resolve this matter in a prompt and reasonable fashion. Instead of working with my office to resolve this matter and claims (as outlined by my prior correspondence to you and Mr. King), Mr. King has elected to maintain his position as a purported source of information regarding my clients to *BuzzFeed*, knowing that his conduct is wrongful and may cause damages to my clients. Accordingly, to the extent Mr. King has suffered any type of "emotional distress", he has brought that upon himself as a result of his conduct.

Please let me know if Mr. King would like to reconsider his position and resolve this matter in a cooperative fashion as proposed by my prior correspondence, including Mr. King notifying *BuzzFeed* in writing that it may not rely on him as the source of any information pertaining to my clients.

All rights, claims and remedies on behalf of my clients remain reserved.

Very truly yours,

BRIAN G. WOLF
Of
LAVELY & SINGER
PROFESSIONAL CORPORATION

BGW/mj